

# Exhibit N

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION

THE STATE OF LOUISIANA,  
By and through its Attorney General, JEFF  
LANDRY;

THE STATE OF MONTANA,  
By and through its Attorney General, AUSTIN  
KNUDSEN;

THE STATE OF ARIZONA, By and through  
its Attorney General, MARK BRNOVICH;

THE STATE OF ALABAMA, By and through  
its Attorney General, STEVE MARSHALL;

THE STATE OF GEORGIA, By and through  
its Attorney General, CHRISTOPHER CARR;

THE STATE OF INDIANA, By and through  
its Attorney General, THEODORE M.  
ROKITA;

THE STATE OF MISSISSIPPI, By and through  
its Attorney General, LYNN FITCH;

THE STATE OF OKLAHOMA, By and  
through its Attorney General, JOHN M.  
O'CONNOR;

THE STATE OF SOUTH CAROLINA, By  
and through its Attorney General, ALAN  
WILSON;

THE STATE OF UTAH, By and through its  
Attorney General, SEAN D. REYES;

THE STATE OF WEST VIRGINIA, By and  
through its Attorney General, PATRICK  
MORRISEY;

PLAINTIFFS,

v.

CIVIL ACTION NO. \_\_\_\_\_

**DECLARATION OF ADAM MEIER**

XAVIER BECERRA, in his official capacity as  
Secretary of Health and Human Services;

THE U.S. DEPARTMENT OF HEALTH  
AND HUMAN SERVICES;

CHIQUITA BROOKS-LASURE, in her official  
capacity of Administrator of the Centers for  
Medicare & Medicaid Services;

CENTERS FOR MEDICARE & MEDICAID  
SERVICES;

DEFENDANTS.

1. I am Director of the Montana Department of Public Health and Human Services (DPHHS). This declaration is based on information available to me as Director of DPHHS, and I could competently testify to its contents if called to do so.

2. I have been employed in this position since February 1, 2021.

3. In my role as Director of DPHHS, my responsibilities include management and oversight of all DPHHS functions, agencies, and divisions, including the Montana Medicaid program and the six health care facilities which DPHHS operates and for which it is responsible.

4. In state fiscal year 2021, Montana received \$1.78 billion in Medicaid federal revenues. 25% of the State's budget are federal funds for Medicaid.

5. The vast majority of Montana counties are federally designated as Health Professional Shortage Areas.

6. Montana operates six state-run healthcare facilities that receive both Medicare and Medicaid funding and are subject to the Vaccine Mandate. These include the Montana State

Hospital, the Montana Mental Health Nursing Care Center, the Montana Chemical Dependency Center, the Montana Veteran's Home, the Eastern Montana Veteran's Home, and the Southwestern Montana Veteran's Home.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF MONTANA THAT THE FOREGOING IS TRUE AND CORRECT.

  
Adam Meier

Executed in Helena, Montana, this 15th day of November 2021.